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[Proposed] Attorneys for the Official Committee of  
Unsecured Creditors

**UNITED STATES BANKRUPTCY COURT  
CENTRAL DISTRICT OF CALIFORNIA  
NORTHERN DIVISION**

In re:

HVI CAT CANYON, INC.

Debtor.

Case No.: 19-bk-11573-MB  
Chapter 11

**REQUEST FOR CONTINUANCE OF HEARING  
ON:**

- (1) APPLICATION FOR ORDER AUTHORIZING  
AND APPROVING THE EMPLOYMENT OF  
PACHULSKI STANG ZIEHL & JONES LLP AS  
COUNSEL FOR THE OFFICIAL COMMITTEE  
OF UNSECURED CREDITORS, EFFECTIVE  
AS OF AUGUST 16, 2019 [Docket No. 214];**
- (2) APPLICATION OF THE OFFICIAL  
COMMITTEE OF UNSECURED CREDITORS  
FOR AUTHORIZATION TO RETAIN AND  
EMPLOY CONWAY MACKENZIE, INC. AS  
FINANCIAL ADVISOR, EFFECTIVE AS OF  
AUGUST 16, 2019 [Docket No. 219]; and**
- (3) MOTION OF THE OFFICIAL COMMITTEE  
OF UNSECURED CREDITORS FOR AN  
ORDER (I) ESTABLISHING INFORMATION  
SHARING PROCEDURES AND (II) GRANTING  
RELATED RELIEF [Docket No. 223]**

[Relates to Docket Nos. 214, 219, 223, 346, 347, 348,  
and 379]

Current Hearing Date

Date: October 28, 2019  
Time: 10:00 a.m.  
Place: Courtroom 201  
U.S. Bankruptcy Court  
1415 State Street  
Santa Barbara, CA 93101  
Judge: Hon. Martin R. Barash

Proposed Continued Hearing Date

To be Determined by the Court

**TO THE HONORABLE MARTIN R. BARASH, UNITED STATES BANKRUPTCY JUDGE,  
THE OFFICE OF THE UNITED STATES TRUSTEE, CALIFORNIA STATE LANDS  
COMMISSION, AND PARTIES REQUESTING SPECIAL NOTICE:**

Pachulski Stang Ziehl & Jones LLP, proposed counsel to the Official Committee of Unsecured Creditors (the “Committee”) in the above-captioned case, hereby requests a continuance of the hearing on (a) *Application For Order Authorizing and Approving the Employment of Pachulski Stang Ziehl & Jones LLP as Counsel for the Official Committee of Unsecured Creditors, Effective as of August 16, 2019* [Docket No. 214] (the “PSZJ Retention Application”), (b) *Application of the Official Committee of Unsecured Creditors for Authorization to Retain and Employ Conway Mackenzie, Inc. as Financial Advisor, Effective as of August 16, 2019* [Docket No. 219] (the “Conway Retention Application”), and (c) *Motion of the Official Committee of Unsecured Creditors for an Order (I) Establishing Information Sharing* [Docket No. 223] (the “Committee Information Motion”, and together with the PSZJ Retention Application and the Conway Retention Application, the “Motions”), from October 28, 2019 to either November 6, 2019 or November 7, 2019.

The request to continue the hearing on the Motions is made at the request of Michael A. McConnell, the recently appointed Chapter 11 Trustee in this case (the “Chapter 11 Trustee”). The Committee desires to accommodate the Chapter 11 Trustee’s request in light of his recent appointment. However, since the two venue transfers have prevented the Committee professionals from obtaining an order approving their retention for several weeks, the Committee would prefer not to wait to hear the Motions until the next regularly scheduled omnibus hearing set for November 22, 2019, and thus has requested that they be specially set for hearing.

Dated: October 24, 2019

PACHULSKI STANG ZIEHL & JONES LLP

By /s/ Jeffrey N. Pomerantz  
[Proposed] Attorneys for Official Committee  
of Unsecured Creditors

## PROOF OF SERVICE OF DOCUMENT

I am over the age of 18 and not a party to this bankruptcy case or adversary proceeding. My business address is:  
**10100 Santa Monica Boulevard, 13<sup>th</sup> Floor, Los Angeles, CA 90067**

A true and correct copy of the foregoing document entitled (*specify*): **REQUEST FOR CONTINUANCE OF HEARING ON: (1) APPLICATION FOR ORDER AUTHORIZING AND APPROVING THE EMPLOYMENT OF PACHULSKI STANG ZIEHL & JONES LLP AS COUNSEL FOR THE OFFICIAL COMMITTEE OF UNSECURED CREDITORS, EFFECTIVE AS OF AUGUST 16, 2019 [Docket No. 214]; (2) APPLICATION OF THE OFFICIAL COMMITTEE OF UNSECURED CREDITORS FOR AUTHORIZATION TO RETAIN AND EMPLOY CONWAY MACKENZIE, INC. AS FINANCIAL ADVISOR, EFFECTIVE AS OF AUGUST 16, 2019 [Docket No. 219]; and (3) MOTION OF THE OFFICIAL COMMITTEE OF UNSECURED CREDITORS FOR AN ORDER (I) ESTABLISHING INFORMATION SHARING PROCEDURES AND (II) GRANTING RELATED RELIEF [Docket No. 223]** will be served or was served **(a)** on the judge in chambers in the form and manner required by LBR 5005-2(d); and **(b)** in the manner stated below:

**1. TO BE SERVED BY THE COURT VIA NOTICE OF ELECTRONIC FILING (NEF):** Pursuant to controlling General Orders and LBR, the foregoing document will be served by the court via NEF and hyperlink to the document. On (*date*) **October 24, 2019**, I checked the CM/ECF docket for this bankruptcy case or adversary proceeding and determined that the following persons are on the Electronic Mail Notice List to receive NEF transmission at the email addresses stated below:

☒ Service information continued on attached page

**2. SERVED BY UNITED STATES MAIL:**

On (*date*) **October 24, 2019**, I served the following persons and/or entities at the last known addresses in this bankruptcy case or adversary proceeding by placing a true and correct copy thereof in a sealed envelope in the United States mail, first class, postage prepaid, and addressed as follows. Listing the judge here constitutes a declaration that mailing to the judge will be completed no later than 24 hours after the document is filed.

**VIA U.S. MAIL**

Office of the U.S. Trustee  
Brian Fittipaldi  
1415 State Street, Suite 148  
Santa Barbara, CA 93101

☒ Service information continued on attached page

**3. SERVED BY PERSONAL DELIVERY, OVERNIGHT MAIL, FACSIMILE TRANSMISSION OR EMAIL** (*state method for each person or entity served*): Pursuant to F.R.Civ.P. 5 and/or controlling LBR, on (*date*) **October 24, 2019**, I served the following persons and/or entities by personal delivery, overnight mail service, or (for those who consented in writing to such service method), by facsimile transmission and/or email as follows. Listing the judge here constitutes a declaration that personal delivery on, or overnight mail to, the judge will be completed no later than 24 hours after the document is filed.

**VIA OVERNIGHT DELIVERY**

Honorable Martin R. Barash  
U.S. Bankruptcy Court  
21041 Burbank Boulevard, Suite 342 / Courtroom 303  
Woodland Hills, CA 91367-6603

**VIA EMAIL**

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☒ Service information continued on attached page

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct.

October 24, 2019

Nancy H. Brown

/s/ Nancy H. Brown

Date

Printed Name

Signature

This form is mandatory. It has been approved for use by the United States Bankruptcy Court for the Central District of California.

## SERVICE INFORMATION FOR CASE NO. 19-bk-11573-MB

### 1. TO BE SERVED BY THE COURT VIA NOTICE OF ELECTRONIC FILING (NEF)

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**REQUESTS FOR SPECIAL NOTICE**

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